

	<b>Discovery Requests</b>	<b>Current Status</b>
1.	Forensic copies of CHS's cell phones and chats.	The government has not provided access to the devices or forensic imagines of the devices.
2.	Backup of hardware used by the CHS.	The government has not provided access to the iCloud backups
3.	Bank account numbers and statements for accounts used by the CHS for accounts that received money from Omar.	The government provided redacted copies of a bank account from Santander. It has not given us any records of the Chase account as it originally told the Court it would. Mr. Amanat requests a full accounting of money paid to Mr. Enotiades.
4.	Records of payment by the government.	No documentation has been produced for the estimated \$1,700,000-\$6,000,000 the government has paid Mr. Enotiades.
5.	Records of communications with government agents.	Agent Amato asked DEA agents for recollections, "While two handlers recall that Enotiades mentioned having met Omar Amanat in or about 2017, these handlers did not task Enotiades with any work concerning the Amanats." The government has not provided us with any results from an actual search or any documents which would be relevant.
6.	Government reports regarding Enotiades credibility and employment.	No information has been provided. The government did provide us with a press release about a time Mr. Enotiades' handler was convicted of a crime.
7.	Communications between Enotiades and Kola Aluko.	The government has provided us with a subset of text messages between Kola Aluko and Enotiades. We request forensically sound copies of messages.
8.	Communications with certain other parties about Omar Amanat.	We have not received any reports of communications between Enotiades and individuals and numbers written in 3558-29. We request forensically sound copies of communication regarding Lakis, Jim Hackney, Jose Agostino, Jason, Jim Rogers, Cristian, Johnie, Dino, Israel, Mezey, Roar, Anly.

9.	Communications with Vladislav Doronin.	The government has not given us any communications with Doronin, despite Enotiades' statement to prosecutors that he is in communication with Doronin.
10.	Documents or notes of communications with Enotiades about Mr. Amanat.	The government has not given us any reports or notes from communications between Enotiades and the DEA concerning Amanats.
11.	Enotiades' travel mentioned in text messages with the Amanats.	The government has not given us any reports or notes from Mr. Enotiades' travel to Thailand and Australia on behalf of the government and has only asked Enotiades for his recollections.
12.	Enotiades' process for signing up subsources and avoiding conflict between his private clients and work for the government.	The government has not provided any documents or information. Their only response has been that Enotiades was not "directed by the FBI-NY to enlist sub-sources."
13	Payments for consulting work.	The government has not provided any documents or information. The government has merely asked Mr. Enotiades about payments for his work.